

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	Criminal No. 5:15-CR-198 (BKS)
)	
v.)	Government's Witness List
)	
CLAYTON BROTHERS,)	
)	
Defendants.)	

On behalf of the United States of America, Assistant United States Attorney Douglas G. Collyer hereby lists the witnesses who may be called to testify in the trial of the above-captioned Indictment.

WITNESSES:

1. Homeland Security Investigations Special Agent Christopher Revord. Agent Revord is expected to testify regarding his interview with the defendant on May 12, 2015.
2. New York State Police Investigator Peter Kraengel. Investigator Kraengel is expected to testify regarding the interview with the defendant on May 12, 2015.
3. New York State Police Investigator Christopher Nye. Investigator Nye is expected to testify regarding securing the firearms, ammunition, and other evidence on April 29, 2014.
4. New York State Parole Officer Christopher Lawrence. Officer Lawrence is expected to testify regarding securing the firearms, ammunition, and other evidence on April 29, 2014.
5. John Parker is expected to testify regarding his actions in finding the firearms, ammunition, and other evidence.
6. Jamie Brothers is expected to testify to her relationship with the defendant, their interactions and home life at 861 Blanchard Hill Road.

7. Robyn Hicks is expected to testify to her relationship with the defendant, their interactions and home life at 861 Blanchard Hill Road.
8. Customs and Border Protection Paralegal Specialist Teri Johnson is expected to testify regarding the defendant's response on the Notice of Seizure Petition.
9. Bureau of Alcohol, Tobacco, and Firearms Special Agent Jason Stocklas. Agent Stocklas is expected to testify to the interstate nexus of the firearms and ammunition.
10. The Government also anticipates calling a representative from Cheaperthandirt.com to introduce receipts, but we have not yet been provided with the name of the witness who will be made available to testify.
11. The Government also anticipates calling a representative from JP Morgan Chase to introduce bank records, but we have not yet been provided with the name of the witness who will be made available to testify.

Certificate of Service

I, Douglas G. Collyer, hereby certify that I served a copy of this notice on defense counsel by electronic filing.

March 14, 2016

/s/ Douglas G. Collyer
Douglas G. Collyer